

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :  
HILEY M. PEREZ : CHAPTER 13  
Debtor. :  
\*\*\*\*\*  
NEWREZ LLC, d/b/a SHELLPOINT :  
MORTGAGE SERVICING :  
Movant, :  
:  
vs. :  
HILEY M. PEREZ : CASE NO. 5-21-00695  
Respondents. :  
\*\*\*\*\*

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM  
AUTOMATIC STAY UNDER SECTION 362**

\*\*\*\*\*

AND NOW COMES, Hiley Perez, the Debtor, and files an Answer to NewRez LLC's Motion  
for Relief From the Automatic Stay:

1. Hiley Perez (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make post-petition mortgage payments.
3. Debtor had to close her business due to COVID resulting in a decrease in monthly income, which caused the default of the mortgage payments.
4. The Debtor wishes to enter into a Stipulation to include the arrears in an amended Chapter 13 Plan.
5. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: July 30, 2021

/s/Tullio DeLuca  
Tullio DeLuca, Esquire  
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(570) 347-7764

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\*\*\*\*\*  
**CERTIFICATE OF SERVICE**  
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The undersigned hereby certifies that on July 29, 2021, he caused a true and correct copy of  
Debtor's Answer to NewRez's Motion for Relief from the Automatic Stay to be served Via First Class  
United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Jack N. Zaharopoulos, Esq. at [info@pamd13trustee.com](mailto:info@pamd13trustee.com)

Rebecca Solarz, Esq. at [rsolarz@kmlawgroup.com](mailto:rsolarz@kmlawgroup.com)

Dated: July 29, 2021

/s/Tullio DeLuca  
Tullio DeLuca, Esquire